

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

WORD COUNT COMPLIANCE

I certify that the **Joint Response by Nonparty VitaHEAT Medical, LLC and Defendants to Plaintiffs' Objection to Magistrate Judge's Denial of Plaintiffs' Motion to Overrule VitaHEAT's Relevance Objection** complies with Local Rule 72.2(c). Specifically, we affirm that the document complies with the limitations set forth in LR 72.2(c)(1), as well as the type size requirements set forth in LR 72.2(c)(2).

I further certify that in preparation of this memorandum, I used Microsoft® Office Word 2010, and the word processing program has an appropriate functioning word count tool applied specifically to include all text, including headings, footnotes, and quotations.

I certify that the above-referenced memorandum contains 3,498 words.

Dated: April 3, 2017

Respectfully submitted,

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